

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of KCP&L Greater Missouri)	
Operations Company for Authority to)	
Implement Rate Adjustments Required By)	<u>Case No. EO-2008-0216</u>
4 CSR 240-20.090(4) and the Company's)	
Approved Fuel and Purchased Power Cost)	
Recovery Mechanism.)	

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEFS

COME NOW, Ag Processing, Inc., a cooperative, the Sedalia Industrial Energy Users' Association, and the Office of the Public Counsel (collectively the "Signatories") and for their Motion for Extension of Time to File Initial Briefs, respectfully state as follows:

1. On January 24, 2011, the Commission issued its Order Adopting Procedural Schedule. That Order called for the filing of Initial Briefs on June 3, 2011.

2. Undersigned counsel have been involved in preparing Initial Briefs in the pending AmerenUE rate proceeding. Furthermore, counsel have had to devote a large amount of resources to the processing of recent rehearing requests in the pending GMO rate case docket as well as the review of compliance tariffs in that case. Finally, counsel are preparing a response to the Commission's proposal to modify the 11-month timeline for processing rate cases.

3. As a result, counsel ask for an extension until June 7, 2011 for all parties to file their Initial Briefs in this matter. This extension would not affect the scheduled June 17 date for filing reply briefs. Given that there is no pending operation of law in this case and the fact that any refunds would likely flow through GMO's next fuel

adjustment change, scheduled for November 2011, this short extension should not inconvenience the parties or the Commission.

4. Counsel have discussed this matter with counsel for Staff and GMO and has been informed that neither opposes this short extension.

WHEREFORE, the Signatories respectfully request that the Commission grant an extension to file Initial Briefs until Tuesday, June 7, 2011.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

INDUSTRIAL INTERVENORS

/s/ Lewis Mills

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ATTORNEY FOR AG
PROCESSING, INC. AND THE
SEDALIA INDUSTRIAL ENERGY
USERS' ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

A handwritten signature in black ink, appearing to read "David L. Woodsmall", written in a cursive style.

David L. Woodsmall

Dated: June 1, 2011